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20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **(SAN FRANCISCO DIVISION)**

23 WALTER SPURLOCK and ANDRE
24 GUIBERT,
Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, AIRPORT COMMISSION OF
THE CITY AND COUNTY OF SAN
FRANCISCO, KEABOKA MOLWANE in
his individual capacity and official capacity as
Aviation Security and Regulatory Compliance
Officer at the San Francisco International
Airport, and JEFF LITTLEFIELD in his
individual capacity and official capacity as
Chief Operating Officer at San Francisco
International Airport,

Defendants.

Case No. 3:23-cv-4429
Jury Trial Demanded

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER PORTIONS OF
PLAINTIFFS' RESPONSE SHOULD BE
SEALED**

Action filed: August 28, 2023

**ADMINISTRATIVE MOTION TO CONSIDER WHETHER PORTIONS OF
PLAINTIFFS' RESPONSE SHOULD BE SEALED**

Pursuant to Civil Local Rules 79-5 and 7-11, Plaintiffs Walter Spurlock and Andre Guibert, by and through their attorneys, move this Court to consider whether portions of Plaintiffs' Response to Defendant's Motion to Dismiss the Second Amended Complaint should be sealed. Pursuant to the parties' protective order, Defendant has designated as "Confidential" TSA National Amendment: Centralized Revocation Database for Individual with Revoked Identification Media TSA-NA-21-01A ("TSA-NA-21-01A"). That a Confidential designation has been placed on a federal regulation that governs Plaintiffs' substantive and procedural rights and which underpins Plaintiffs' legal claims is deeply offensive to the American system of open justice. Nevertheless, Plaintiffs have submitted a redacted Response and identify the following as containing or reflecting information within TSA-NA-21-01A:

| Document title or description | Dkt. No. of redacted version | Dkt. No. of unredacted version | Dkt. No. of decl. in support of sealing | Party with burden to substantiate need to seal | Full or partial sealing sought | Brief statement of reason for sealing (with citation to corresponding declaration in support of sealing) | Granted/Denied (leave blank) |
|--------------------------------------|-------------------------------------|---------------------------------------|--|---|---------------------------------------|---|-------------------------------------|
| Response | 50 | 49-2 | 49-1 | Defendants | Partial | Reflecting information contained within document that Defendants have marked | |

| | | | | | | | |
|--|--|--|--|--|--|--------------------------------|--|
| | | | | | | Confidential (Seham Decl. ¶ 4) | |
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Dated March 15, 2024

Respectfully submitted,

JOHN K. BUCHE
BYRON MA
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LEE SEHAM (*Pro Hac Vice*)
SAMUEL A. SEHAM (*Pro Hac Vice*)
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By: /s/ Samuel A. Seham

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 15, 2024, a copy of the foregoing document was duly served via CM/ECF to the following:

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